



## **PARTIES**

6. Plaintiff is a natural person residing in Raytown, Jackson County, Missouri.
7. Plaintiff is allegedly obligated to pay a debt and is a consumer as defined by 15 U.S.C. § 1692a(3).
8. Defendant is a national corporation with a business office located in Eden Prairie, Hennepin County, Minnesota.
9. Defendant is a debt collector as defined by 15 U.S.C. § 1692a(6), and sought to collect a consumer debt from Plaintiff.
10. At all times relevant to this Complaint, Defendant has acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives and insurers in the District of Missouri.

## **FACTUAL ALLEGATIONS**

11. The amount of Plaintiff's alleged debt is five hundred ninety-two dollars and forty-three cents (\$592.43).
12. Defendant constantly and continuously places collection calls to Plaintiff throughout the day, everyday, seeking and demanding payment for the alleged debt.

## **COUNT I DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT**

13. Defendant violated the FDCPA based on the following:
  - a. Defendant violated §1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse the Plaintiff.
  - b. Defendant violated §1692d(5) of the FDCPA by causing a telephone to ring repeatedly and continuously with the intent to annoy, abuse, and harass Plaintiff.

WHEREFORE, Plaintiff, FREDRICK L. COX, respectfully requests judgment be entered against Defendant, BUREAU OF COLLECTION RECOVERY, INC., for the following:

14. Declaratory judgment that Defendant's conduct violated the Fair Debt Collection Practices Act,
15. Statutory damages pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k*,
16. Actual damages,
17. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, *15 U.S.C. 1692k*
18. Any other relief that this Honorable Court deems appropriate.

RESPECTFULLY SUBMITTED,

By: /s/ Patrick Cuezze  
[ ] Patrick Cuezze  
Attorney for Plaintiff  
Krohn & Moss, Ltd.  
120 W. Madison Street  
10<sup>th</sup> Floor  
Chicago, IL 60602

**DEMAND FOR JURY TRIAL**

PLEASE TAKE NOTICE that Plaintiff, FREDRICK L. COX, hereby demands trial by jury in this action.

**VERIFICATION OF COMPLAINT AND CERTIFICATION**

(STATE OF MISSOURI)

Plaintiff, FREDRICK L. COX states the following:

1. I am the Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, FREDRICK L. COX, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
FREDRICK L. COX